

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

RICHARD MA and FRED DEVEREAUX,  
individually and on behalf of all others similarly  
situated,

Plaintiffs,

v.

MAPFRE U.S.A. CORP. and THE COMMERCE  
INSURANCE COMPANY,

Defendants.

Case No. 1:23-cv-12059

BRIAN CONWAY, individually and  
on behalf of all similarly situated persons,

Plaintiff,

v.

MAPFRE U.S.A. CORP. and THE COMMERCE  
INSURANCE COMPANY,

Defendants.

Case No. 1:23-cv-12076

PAMELA BROWN, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

MAPFRE U.S.A. CORP. and THE COMMERCE  
INSURANCE COMPANY,

Defendants.

Case No. 3:23-CV-12101

LYNNE ALEXANDEROWICS, individually and  
on behalf of all similarly situated persons,

Plaintiff,

v.

MAPFRE U.S.A. CORP. and THE COMMERCE  
INSURANCE COMPANY,

Defendants.

Case No. 4:23-CV-40125

BRIAN RAY, individually and  
on behalf of all similarly situated persons,

Plaintiff,

v.

MAPFRE U.S.A. CORP. and THE COMMERCE  
INSURANCE COMPANY,

Defendants.

Case No. 1:23-CV-12214

VERONICA GREGORY, individually and  
on behalf of all similarly situated persons,

Plaintiff,

v.

MAPFRE U.S.A. CORP. and THE COMMERCE  
INSURANCE COMPANY,

Defendants.

Case No. 1:23-cv-12225

**PLAINTIFFS' UNOPPOSED MOTION TO  
APPOINT AN EXECUTIVE COMMITTEE PURSUANT TO FED. R. CIV. P. 23(G)**

**TO ALL PARTIES AND COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE** that pursuant to Fed. R. Civ. P. 23(g), Plaintiffs Richard Ma, Fred Devereaux, Brian Conway, Pamela Brown, Lynne Alexanderowics, Brian Ray, and Veronica Gregory ("Plaintiffs") respectfully seek appointment of an Executive Committee comprised of the following: Jason Rathod of Migliaccio & Rathod LLP, Andrew W. Ferich of

Ahdoot & Wolfson PC, Mark B. DeSanto of Berger Montague PC, Gary F. Lynch of Lynch Carpenter LLP, Joseph P. Guglielmo of Scott+Scott Attorneys At Law LLP, and Kate Baxter-Kauf of Lockridge Grindal Nauen P.L.L.P., to act on behalf of the Plaintiffs in the above captioned matters. Proposed Counsel submits the attached memorandum and declarations of Proposed Counsel in support of this Motion.

Defendants, MAPFRE U.S.A. Corp., and the Commerce Insurance Company, have indicated they take no position on proposed leadership but do not intend to oppose this motion.

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1(a)(2)**

In accordance with Local Rule 7.1(a)(2), prior to filing this motion, Plaintiffs' counsel conferred with Defendants' counsel, who indicated that Defendants take no position on proposed leadership but do not intend to oppose this motion.

Date: September 29, 2023

Respectfully submitted,

By: /s/ Patrick J. Sheehan  
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